




HELEN F. DALTON & ASSOCIATES, P.C.
ATTORNEYS AT LAW

80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415

Application granted. The time for Plaintiff to file his response to both pre-motion letters and Rule 56.1 Statements is extended to August 11, 2025.

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
August 5, 2025

Via ECF:

The Honorable Philip M. Halpern
United States District Court
Southern District of New York
Federal Building and Courthouse
300 Quarropas Street, Room 530
White Plains, New York 10601

Re: **Ortega et al v. Healthy Choice Markets IV, LLC et al.**
Civil Docket No.: 7:24-cv-05682-PMH

Dear Judge Halpern:

We represent the Plaintiff in this FLSA action, and we respectfully submit this letter motion, on consent of counsel for all Defendants, to respectfully request an extension of one (1) week to file Plaintiff's Responses to Defendants' Healthy Choice Markets IV, LLC and Green's Natural Foods, Inc.'s request for pre-motion conference and Rule 56.1 Statement.

We make this request as the undersigned was out-of-office on a jury trial for an unrelated matter in the EDNY Courthouse during the week of July 21, 2025 and pre-scheduled vacation last week. In light of this, Plaintiff requests an additional week, or by August 11, 2025, to submit Plaintiff's responses to both Healthy Choice Defendants and Green's Natural Food Defendants pre-motion letters and Rule 56.1 Statements. The undersigned sincerely apologizes for failing to make this request within the 48-hour period as outlined in Your Honor's Individual Rules 1(C). The undersigned conferred with counsel for Defendants regarding this request. Counsel for Defendants did not raise any objections to this request.

This is the first request for an extension of this deadline, and this will not affect any other deadlines.

We thank Your Honor for his kind consideration on this matter, and we remain available to provide any additional necessary information.

Respectfully submitted,

Katelyn Schillaci
Katelyn M. Schillaci, Esq.

CC: counsel for the defendants via ECF.